Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. OTTERBOURG P.C. 230 Park Avenue New York, New York 10169 Telephone: (212) 661-9100 Facsimile: (212) 682-6104

Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

		. <b>v</b>	
In re		:	Chapter 11
		:	
PURDUE PHARMA L.P.,	et al.,	:	Case No. 19-23649 (RDD)
		:	
	Debtors <sup>1</sup> .	:	(Jointly Administered)
		· x	-

# THIRTEENTH MONTHLY FEE STATEMENT OF OTTERBOURG P.C. FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL OF THE AD HOC COMMITTEE'S PROFESSIONALS FOR THE PERIOD OF OCTOBER 1, 2020 THROUGH AND INCLUDING OCTOBER 31, 2020

Name of Applicant:	Otterbourg P.C.
Applicant's Role in Case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:	December 2, 2019, [dkt. no. 553]

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Period for Which Compensation is Sought:	October 1, 2020 – October 31, 2020
Total Amount of Fees Incurred:	\$141,697.00
Total Fees Requested (80%):	\$113,357.60
Total Reimbursement of Expenses Incurred:	\$745.01
Total Reimbursement of Expenses Requested (100%):	\$745.01
Total compensation and Reimbursement Requested in this Statement:	\$114,102.61
This is Applicant's:	Thirteenth Monthly Fee Statement

Pursuant to the Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee's Professionals, dated December 2, 2019 [Dkt. No. 553] (the "Fee Assumption Order"), and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals, dated November 21, 2019 [Dkt. No. 529] (the "Interim Compensation Order"), Otterbourg P.C. (the "Applicant"), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants in the above-captioned case, hereby submits this Thirteenth Monthly Fee Statement (the "Fee Statement") for the period of October 1, 2020 – October 31, 2020 (the "Statement Period").

#### **Itemization of Services Rendered and Disbursements Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Statement Period with respect to each of the project categories. As reflected in Exhibit A, Applicant incurred \$141,697.00 in fees during the Statement Period. Pursuant to this Fee Statement, Applicant seeks reimbursement for 80% of such fees, totaling \$113,357.60.

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- 2. Annexed hereto as **Exhibit B** is a chart of Applicant's professionals and paraprofessionals, including the standard hourly rate for each attorney and paraprofessional who rendered services to the Debtors in connection with these chapter 11 cases during the Statement Period and the title, hourly rate, aggregate hours worked and the amount of fees earned by each professional.<sup>2</sup> The blended hourly billing rate of attorneys for all services provided during the Statement Period is \$1,253.96<sup>3</sup>. A copy of the computer-generated time entries reflecting the time recorded, organized in project billing categories by Applicant is attached hereto as **Exhibit C**.
- 3. Annexed hereto as **Exhibit D** is a chart of necessary and out-of-pocket expenses incurred by the Applicant in the amount of \$745.01 in connection with providing professional services during the Statement Period. A copy of the computer-generated list of expenses is attached hereto as **Exhibit E**.
- 4. Applicant, to the best of its knowledge, has not included any fees in connection with or relating to the allocation of value among the Debtors' creditors (the "Allocation Fees"). Pursuant to the Fee Assumption Order, Applicant may request Allocation Fees through a separate application at a later date.

#### **Notice**

In accordance with the Interim Fee Order and Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York Bankruptcy Cases (June 17, 2013), Otterbourg is providing notice that its hourly rates changed during this Monthly Fee Period, effective October 1, 2020. Otterbourg's hourly rates are set at a level designed to fairly compensate it for the work of its attorneys and paraprofessionals. Otterbourg's hourly rates are subject to periodic adjustment to reflect economic and other conditions and are consistent with the rates charged by other firms rendering comparable services. Otterbourg determined to adjust its rates in the manner set forth herein after its annual review of its hourly rates. In accordance with Section 330(a)(3)(F) of title 11 of the United States Code, as amended (the "Bankruptcy Code"), Otterbourg represents that the hourly rates, as set forth herein, (a) reflect economic and other conditions, (b) are consistent with rates charged elsewhere, and (c) are reasonable based on the customary compensation charged by practitioners of comparable skill in cases other than cases under the Bankruptcy Code.

The blended hourly billing rate of \$1,253.96 is derived by dividing the total fees for attorneys of \$141,697.00 by the total hours of 113.0.

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5. Applicant will provide notice of this Fee Statement in accordance with the Interim

Compensation Order.

WHEREFORE, Applicant, in connection with services rendered as co-counsel to the ad

hoc committee of governmental and other contingent litigation claimants, respectfully requests

(i) compensation in the amount of \$113,357.60 which is equal to 80% of the total amount of

reasonable compensation for actual, necessary legal services that Applicant incurred in

connection with such services during the Statement Period (i.e., \$141,697.00) and (ii) payment of

\$745.01 for the actual, necessary expenses that Applicant incurred in connection with such

services during the Statement Period.

Dated: March 17, 2021

New York, New York

OTTERBOURG P.C.

By:

/s/ Melanie L. Cyganowski

Melanie L. Cyganowski, Esq.

Jennifer S. Feeney, Esq.

230 Park Avenue

New York, New York 10169

Telephone: (212) 661-9100

Facsimile: (212) 682-6104

Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent

Litigation Claimants

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### **EXHIBIT A**

**Fees By Project Category** 

# SUMMARY OF COMPENSATION BY PROJECT CODE FOR THE STATEMENT PERIOD

Project Code	Project Category	Total Hours	Total Fees
PU01	Asset Analysis and Recovery	5.7	\$5,101.50
PU04	Case Administration	18.2	\$22,460.50
PU05	Claims Analysis	45.4	\$63,408.50
PU06	Employment and Fee Applications	.6	\$537.00
PU08	Litigation: Contested Matters, Adversary	2.2	\$1,969.00
PU09	Meetings and Communications w/ AHC	14.2	\$18,415.50
PU11	Plan & Disclosure Statement	26.7	\$29,805.00
	TOTALS:	113.0	\$141,697.00

### EXHIBIT B

**Professional and Paraprofessional Fees** 

# SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS FOR THE STATEMENT PERIOD

Professional	Year Admitted	Previous Rate Per Hour	Rate Per Hour	No. of Hrs.	Total Compensation
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00	\$1400.00	80.8	\$113,120.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	\$895.00	31.1	\$27,834.50
Robert C. Yan ("RCY") Associate	2002	\$625.00	\$675.00	1.1	\$742.50
	TOTAL			113.0	\$141,697.00

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### **EXHIBIT C**

**Time Detail** 

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### OTTERBOURG P.C. 230 Park Avenue New York, NY 10169-0075

March 14, 2021

BILL NO. 215867

Client/Matter No.: 20186/0002 Matter Name: CHAPTER 11

Billing Partner: RL STEHL

For Services Rendered Through October 31, 2020:

Phase: PUC	1	ASSET ANALYSIS	AND RECOVERY
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/09/20 JSF	Telephone Call(s) Participate in ACH and NCSG Conference re Sackler/Purdue Due Diligance	2.20	1,969.00
10/13/20 JSF	Telephone Call(s) Participate in Video Conference with Ful AHC re: Sackler and IAC Due Diligence Update	1.00	895.00
10/19/20 JSF	Telephone Call(s) Participate in Conference with UCC, AHC and NCSG re: Insider Transfer Analysis	1.40 ad	1,253.00
10/19/20 JSF	Examine Documents Review of Debtors' Omnibus Reply to UCC Motion to Compel Production of Privilege Documents		537.00
10/19/20 JSF	Examine Documents Review of Non-Cash Transfers Deck Prepare by UCC for Discussion	.50 ed	447.50
TOTAL PHAS	SE PU01	5.70	\$5,101.50

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### OTTERBOURG P.C.

#### 230 PARK AVENUE

New York, NY 10169-0075

Client/Matter: 20186/0002 March 14, 2021

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DATE

ATTORNEY DESCRIPTION HOURS AMOUNT

Phase: PUO	04	CASE ADM	MINISTRATION
DATE ATTORNEY	DESCRIPTION	<u>HOURS</u>	<u>A</u> MOUNT
10/04/20 MLC	Analysis of Memorandum Review of article about Sacklers' wealth	.70	980.00
10/06/20 MLC	Analysis of Memorandum Review of Stipulation and Agreed Order for the Withdrawal without Prejudice of the City of Bellefontaine Neighbors, Missouri's Motion to Allow Late Filed Claim	.40	560.00
10/07/20 MLC	Analysis of Memorandum Review of articles re plea agreement between Purdue Pharma and Sacklers and DOJ	.70	980.00
10/07/20 MLC	Correspondence Review of Guard email re DOJ and NCSG reaction	.30	420.00
10/08/20 MLC	Analysis of Memorandum Review of Court order approving the request from the UCC and NCSG to serve discovery on current and former executives	.80	1,120.00
10/12/20 JSF	Correspondence E-Mail to Debtor re: Payment of Monthly Fee Statement	.20	179.00

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#### Otterbourg P.C.

#### 230 PARK AVENUE

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DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/12/20 Analysis of Memorandum .60 840.00 MT<sub>i</sub>C Review of Sackler Family quarterly fee analysis 10/12/20 Analysis of Memorandum .70 980.00 MLC Review of KL Update re: Lowne/KEIP 10/14/20 Analysis of Memorandum .80 1,120.00 Review of UCC objection to motion filed by MLC Mortimer Sackler to certain discovery demands and privilege assertions .30 10/15/20 Examine Documents 268.50 Review of Information Sharing Protocol JSF with Debtors for Sign Off by AHC Professionals 10/15/20 Analysis of Memorandum 840.00 .60 Review of Debtors' motion objecting to UCC MLC omnibus motion to compel discovery of privileged documents 10/15/20 420.00 Correspondence .30 Correspondence among AHC professionals re MLC discovery sharing protocol 10/16/20 Examine Documents .60 537.00 Review of Updates to AHC re: Status of JSF Pending Motions and Discovery

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#### OTTERBOURG P.C.

#### 230 PARK AVENUE

NEW YORK, NY 10169-0075

Client/Matter: 20186/0002 March 14, 2021 Page 4 BILL NO. 215867

DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/18/20 Analysis of Memorandum 1.30 1,820.00 MT<sub>i</sub>C Review and analysis of Debtors' motion re discovery costs and release of privilege documents 10/21/20 Examine Documents .20 179.00 JSF Review of KEIP/KERP Proposed Resolution 10/26/20 .50 700.00 Telephone Call(s) Telcon with Paul Singer re NCSG and claims MLC process and next steps .20 10/26/20 280.00 Correspondence MT<sub>i</sub>C Correspondence from HL re analysis of Sacklers' IACs .40 10/27/20 Analysis of Memorandum 560.00 MLC Review of amended agenda for court hearing 10/28/20 Telephone Call(s) 3.10 2,774.50 Participate in Omnibus Court Hearing for JSF Consideration of Among Other Things, Contribution by Sacklers to DOJ Settlement 10/28/20 3.20 4,480.00 Court Appearance - General MLC Hearing on KEIP/KERP motion and motion to confirm Payment of Funds by Sackler family under DOJ settlement

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### Otterbourg P.C.

### 230 PARK AVENUE

NEW YORK, NY 10169-0075

Client/Mat Page 5	ter: 20186/0002		March 14, 2021 BILL NO. 215867
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/29/20 MLC	Correspondence Correspondence with DPW re attorney fees for allocation services by AHC professionals	.40	560.00
10/29/20 RCY	Examine Documents Examine docket and pleadings for summary status.	1.10	742.50
10/30/20 MLC	Correspondence Correspondence with AHC, DPW, UCC and NCSG concerning proposed amendments to joint protective order	.50	700.00
10/30/20 MLC	Correspondence Correspondence among AHC professionals re Debtors' motion to amend order re payment of fees for allocation services	.30	420.00
TOTAL PHAS	E PU04	18.20	\$22,460.50
Phase: PU0	5		CLAIMS ANALYSIS
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/05/20 MLC	Conference call(s) Mediation preparation call with AHC and counsel	1.50	2,100.00

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### OTTERBOURG P.C.

### 230 PARK AVENUE

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DATE <u>ATTORNEY</u>	DESCRIPTION	HOURS	AMOUNT
10/05/20 MLC	Conference call(s) Conference call re Sacklers' financial information and analysis	1.00	1,400.00
10/06/20 MLC	Conference call(s) Conference call meeting with AHC and mediators	2.00	2,800.00
10/06/20 MLC	Correspondence Correspondence with States and Jim Donahue and Troop re coordination of conferences between Brattle and Cornerstone to analyze States POC	.30	420.00
10/06/20 MLC	Correspondence Correspondence with AHC members and AHC professionals re mediation sessions, coordination of presentations and presenters	.90	1,260.00
10/07/20 MLC	Conference call(s) Conference call with AHC delegation re Sackler/Purdue financial information	1.30	1,820.00
10/07/20 MLC	Analysis of Memorandum Review of claims analysis prepared by Gilbert re NAS and other abatement issues	.90	1,260.00
10/08/20 MLC	Correspondence Correspondence with DPW re discovery claims protocol re Consolidated POC	.50	700.00

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DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/09/20 Conference call(s) 2.00 2,800.00 Meeting with AHC and NCSG mediation MT<sub>i</sub>C delegations re Sackler/Purdue financial information 10/09/20 Draft/revise .80 1,120.00 MLC Final review of claims protocol with DPW and Cornerstone/Brattle 10/09/20 .30 420.00 Correspondence Correspondence between Pillsbury and DPW MLC re Consolidated POC 10/09/20 Correspondence . 40 560.00 Correspondence with DPW and NCSG MLC concerning signing of confidential disclosure protocol 10/10/20 Correspondence .30 420.00 MLC Follow up correspondence with DPW re discovery protocol and meetings with Cornerstone and Brattle 10/12/20 Correspondence .60 840.00 MLC Follow up correspondence with DPW and Brattle/Cornerstone re Consolidated POC 10/12/20 Analysis of Memorandum .60 840.00 MLC Review of Guard memo re next steps in mediation

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### OTTERBOURG P.C.

### 230 PARK AVENUE

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/12/20 MLC	Analysis of Memorandum Review of memorandum re mediation strategy	.40	560.00
10/12/20 MLC	Correspondence Correspondence with Troop and Brattle re coordinating meeting and presentation of data with Cornerstone and DPW	.30	420.00
10/13/20 MLC	Conference call(s) Financial presentation re Sacklers/IACs/Purdue	1.00	1,400.00
10/13/20 MLC	Correspondence Follow up correspondence with Guard and core states re Guard mediation memo and next steps	.60	840.00
10/13/20 MLC	Correspondence Correspondence among AHC professionals re abatement term sheet amendments	.20	280.00
10/14/20 MLC	Correspondence Correspondence from Gilbert re UCC presentation re Sacklers and fraudulent transfers	.20	280.00
10/14/20 MLC	Correspondence Review of Troop memo attaching letter from AG Barr to NCSG States re Purdue/Sacklers	.70	980.00

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### OTTERBOURG P.C.

### 230 PARK AVENUE

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/14/20 MLC	Correspondence Correspondence with Mediators, AHC professionals and NCSG re up-coming all hands mediation session	.60	840.00
10/15/20 MLC	Conference call(s) Conference with Cornerstone and Brattle regarding Brattle/States' Model	1.00	1,400.00
10/15/20 MLC	Analysis of Memorandum Review and analysis of Purdue slide presentation re update on company financial status	1.20	1,680.00
10/15/20 MLC	Correspondence Review of DOJ statement re position in mediation and settlement objectives	.80	1,120.00
10/18/20 MLC	Conference call(s) Conference call with AHC counsel and AHC mediation parties re plan discussions	.80	1,120.00
10/19/20 MLC	Conference call(s) Zoom meeting with UCC and NCSG and AHC re UCC litigation analysis	1.30	1,820.00
10/19/20 MLC	Conference call(s) Zoom meeting with Sackler family and AHC representatives	1.10	1,540.00

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### Otterbourg P.C.

### 230 Park Avenue

NEW YORK, NY 10169-0075

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DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/19/20 Conference call(s) .50 700.00 MT<sub>i</sub>C Zoom call with Brattle, Jim Donahue and Andrew Troop re preparing for meeting with Cornerstone 10/20/20 Conference call(s) 2.00 2,800.00 Conference call with AHC mediation MLC subgroup re mediation strategy development 10/20/20 Conference call(s) 1.00 1,400.00 Conference call with DPW and Cornerstone MLC with Brattle and Troop re Consolidated POC 10/20/20 Correspondence . 60 840.00 Correspondence with Brattle and MLC Cornerstone re presentation of factual analysis of POC 10/20/20 Correspondence .80 1,120.00 MLC Correspondence with AHC/NCSG mediation subgroup re DOJ and Sackler negotiations 10/20/20 1.10 Analysis of Memorandum 1,540.00 Review of outline prepared by KL re MLC priorities in mediation and case 10/21/20 Conference call(s) .50 700.00 Conference call with Andrew Troop and MLC Brattle to debrief from call with DPW/Cornerstone the day before

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### OTTERBOURG P.C.

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/21/20 MLC	Correspondence Follow up correspondence between Brattle with Cornerstone re review of additional documents	.40	560.00
10/21/20 MLC	Analysis of Memorandum Review and analysis of DOJ settlement with Purdue	1.40	1,960.00
10/23/20 MLC	Conference call(s) Conference call meeting with mediators and AHC mediation subgroup	1.00	1,400.00
10/26/20 MLC	Correspondence Correspondence with KL re mediation strategy concerning governance issues	.80	1,120.00
10/26/20 MLC	Conference call(s) Conference call with KL and Aaron Cahn re VA plan issues and concerns	.50	700.00
10/27/20 JSF	Examine Documents Review of Summary of Canadian Purdue Claims	.30	268.50
10/27/20 MLC	Telephone Call(s) Telcon with Andrew Troop and Brattle and Jim Donahue re States POC	.40	560.00
10/27/20 MLC	Conference call(s) Conference call with Cornerstone, DPW and Brattle re Consolidated States POC	1.00	1,400.00

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### OTTERBOURG P.C.

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/27/20 MLC	Conference call(s) Conference call with professionals re Purdue and Sacklers	.60	840.00
10/27/20 MLC	Analysis of Memorandum Analysis of memo re claims filed by government in Purdue Canada and their impact on US plan	1.10	1,540.00
10/27/20 MLC	Correspondence Reviewed correspondence between John Guard and David Nachman re reconciliation of NCSG and CSG claims	.70	980.00
10/27/20 MLC	Prepare for Meeting Reviewed documents in preparation for call with Brattle and Cornerstone re States POC	1.30	1,820.00
10/27/20 MLC	Analysis of Memorandum Analysis of KL memo reviewing Debtors/DOJ settlement and critical terms	.90	1,260.00
10/28/20 MLC	Telephone Call(s) Follow up telcon with Andrew Troop re Consolidated State POC and related issues	.50	700.00
10/28/20 MLC	Conference call(s) Follow up call with AHC professionals re third party proposal	.60	840.00

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NEW YORK, NY 10169-0075

March 14, 2021

Client/Matter: 20186/0002

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/28/20 MLC	Analysis of Memorandum Review of amendment filed by Debtors concerning its settlement with DOJ	.60	840.00
10/28/20 MLC	Analysis of Memorandum Analysis of memo prepared by Gilbert concerning status of various negotiation by mediators with key constituent ground		1,680.00
10/28/20 MLC	Analysis of Memorandum Review of structure deck prepared by Gilbert firm	.60	840.00
10/28/20 MLC	Analysis of Memorandum Review of draft of mediation proposal de to present to NCSG tomorrow in mediati session with mediators		840.00
10/29/20 MLC	Correspondence Follow up correspondence with FTI.HL r settlement negotiations and next steps		1,120.00
TOTAL PHAS	E PU05	45.40	\$63,408.50
Phase: PU0	6	EMPLOYMENT &	FEE APPLICATIONS
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT

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NEW YORK, NY 10169-0075

Client/Mat Page 14	ter: 20186/0002		March 14, 2021 BILL NO. 215867
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/26/20 JSF	Prepare Legal Papers Preparation of Interim Fee Applicatio	.60 n	537.00
TOTAL PHAS	SE PU06	.60	\$537.00
Phase: PUO	8 LITIGATION:	: CONTESTED MATT	ERS, ADVERSARY
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/27/20 JSF	Examine Documents Review of Objection of UCC and NCSG t Sacklers Request to Use Funds For DOJ Settlement		1,432.00
10/27/20 JSF	Examine Documents Review of Ad Hoc Committee on Accountability Objection to Sackler Mot to Use Funds	.60	537.00
TOTAL PHAS	SE PU08	2.20	\$1,969.00
Phase: PUO	9 MEETIN	NGS & COMMUNICAT	IONS W/ AD HOC
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT

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### OTTERBOURG P.C.

### 230 PARK AVENUE

NEW YORK, NY 10169-0075

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/01/20 MLC	Correspondence Correspondence with AHC re certain discovery re Sacklers and UCC	.70	980.00
10/05/20 MLC	Analysis of Memorandum Analysis of confidentiality protection overview provided to AHC members	.80	1,120.00
10/05/20 MLC	Correspondence Correspondence re scheduling and coordination re various meetings with members	.30	420.00
10/07/20 JSF	Telephone Call(s) Participate in Weekly Team Conference Call with AHC	1.20	1,074.00
10/07/20 MLC	Conference call(s) Regular weekly meeting with AHC members	1.50	2,100.00
10/07/20 MLC	Conference call(s) Conference call with State Group and KL re mediation phrase II approach	.50	700.00
10/07/20 MLC	Correspondence Correspondence with States representatives and AHC counsel	.40	560.00
10/07/20 MLC	Draft/revise Review and revision to draft agenda for AHC meeting	.30	420.00

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#### OTTERBOURG P.C.

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DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/15/20 Telephone Call(s) .30 268.50 JSF Participate in Weekly AHC Meeting 10/15/20 Conference call(s) 1.00 1,400.00 Weekly conference call with AHC members and MLC counsel .40 10/15/20 Correspondence 560.00 Correspondence among AHC professionals and MLC AHC members re scheduling and coordinating of mediation sessions and AHC subcommittee meetings 10/21/20 Telephone Call(s) . 40 358.00 Participate in Weekly Conference Call with JSF AHC 10/21/20 Conference call(s) 1.30 1,820.00 MLC Weekly AHC meeting 10/26/20 Conference call(s) 1.00 1,400.00 Conference call with John Guard, Singer, MLC Peacock and AHC counsel re claims process 10/28/20 Telephone Call(s) 1.00 895.00 JSF Participate in Weekly Update Call with AHC

10/28/20

MLC

Conference call(s)

Weekly AHC meeting

1.40

1,960.00

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### OTTERBOURG P.C.

### 230 PARK AVENUE

NEW YORK, NY 10169-0075

Client/Mat Page 17	ter: 20186/0002		March 14, 2021 LL NO. 215867
DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/28/20 MLC	Correspondence Correspondence among AHC professionals concerning DOJ settlement and DOJ negotiations with Debtors	.40	560.00
10/28/20 MLC	Prepare for Meeting Prepared for meeting with AHC committee members	.30	420.00
10/28/20 MLC	Correspondence Correspondence between Guard and Gilber concerning settlement negotiations	.30 t	420.00
10/29/20 MLC	Correspondence Correspondence among AHC professionals and certain core states concerning mediation strategy		560.00
10/30/20 MLC	Correspondence Correspondence with certain states re negotiations with NCSG	.30	420.00
TOTAL PHAS	E PU09	14.20	\$18,415.50
Phase: PU1	1	PLAN & DISCLOSUR	E STATEMENT
DATE ATTORNEY	DESCRIPTION	<u>HOURS</u>	<u>AMOUNT</u>

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#### OTTERBOURG P.C.

#### 230 PARK AVENUE

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DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/01/20 Correspondence .80 1,120.00 MT<sub>i</sub>C Correspondence with John Guard and Jonathan Blanton concerning potential resolution of Sacklers' claims 10/01/20 Analysis of Memorandum .80 1,120.00 MLC Review of Hospitals' draft abatement term sheet 10/11/20 .20 280.00 Correspondence Correspondence re upcoming presentation by MLC Debtors of financials 10/13/20 Telephone Call(s) 1.60 1,432.00 Partiicpate in Video Conference With **JSF** Debtor and AHC re: Post-Emergence Entity 10/13/20 Examine Documents .40 358.00 JSF Review and Analysis of Letter from NCSG re: Post-Emergence Entity 10/13/20 Conference call(s) 1.50 2,100.00 Presentation by Purdue to AHC re future of MLC company 10/14/20 Examine Documents .50 447.50 JSF Review and Analysis of Statement from DOJ re: Post-Emergence Company

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/15/20 JSF	Examine Documents Review of Deck re: Overview of PBC Governance/Purpose re: Post-Emergence Entity	1.20	1,074.00
10/18/20 JSF	Telephone Call(s) Participate in Conference Call with AHC Subgroup re: Plan Structure and Upcoming Discussions with Sacklers	.90	805.50
10/19/20 JSF	Telephone Call(s) Participate in Conference with AHC and Debtors re: Post-Emergence Trust Structure	1.10	984.50
10/19/20 MLC	Conference call(s) Zoom meting with debtors counsel re post emergence structure	1.10	1,540.00
10/19/20 MLC	Conference call(s) Zoom meeting with AHC professionals re governance structure	1.00	1,400.00
10/20/20 JSF	Telephone Call(s) Participate in Videoconference with Mediators and Mediation Partie re: Final Plan Isssues and Sackler Contribution	.80	716.00
10/20/20 JSF	Examine Documents Review of Open Issues to Be Addressed in Mediation for Final Issues re: Plan	.30	268.50

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DATE ATTORNEY	DESCRIPTION	HOURS	AMOUNT
10/21/20 JSF	Examine Documents Review and Analysis of Proposed Settlement with DOJ	.50	447.50
10/21/20 JSF	Examine Documents Review of Term Sheet with AHC and Debtor re: Outline for Parameters of a Plan and Sackler Contribution	.70	626.50
10/21/20 MLC	Analysis of Memorandum Analysis of power point presentation prepared by HL concerning governance structure post-confirmation	1.30	1,820.00
10/22/20 JSF	Examine Documents Review of Sackler Settlement with DOJ and Payments to Be Made By Sacklers/Impact on Plan and Other Issues	.80	716.00
10/23/20 JSF	Telephone Call(s) Participate in Conference with Mediators and AHC re: Preliminary Discussin of Issues for Finalizing Plan and Next Steps	1.00	895.00
10/23/20 JSF	Examine Documents Review of Public Statements of Members of NCSG re: DOJ Settlement	.20	179.00
10/23/20 MLC	Conference call(s) Conference call with AHC mediation delegation re Purdue and Trust Structure Options	1.00	1,400.00

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Client/Matter: 20186/0002 March 14, 2021 Page 21 BILL NO. 215867 DATE ATTORNEY DESCRIPTION HOURS AMOUNT 10/26/20 Conference call(s) 1.00 1,400.00 MT<sub>i</sub>C Conference call with counsel re plan

10/27/20 Examine Documents 1.40 1,253.00 JSF Review and Analysis of Sackler and DOJ Settlement and Sackler Motion to Utilize

Funds

process

10/28/20 Examine Documents .40 358.00 JSF

Review of Deck re: Proposed Post-Emergence Governance Structure

10/29/20 Telephone Call(s) 2.30 2,058.50 JSF

Participate in Video Conference Between AHC and NCSG Members re: Post-Emergence Governance Structure

10/29/20 Conference call(s) 2.00 2,800.00 Conference call re AHC structure and MLC

economic presentation to NCSG

10/30/20 .90 805.50 Telephone Call(s)

> Participate in Call with Plan Mediation Subcommittee re: Status of Discussions with NCSG on Post-Emergence Structure

10/30/20 1.00 Conference call(s) 1,400.00

MLC AHC mediation delegation meeting with HL

and FTI

JSF

26.70 TOTAL PHASE PU11 \$29,805.00

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DATE

ATTORNEY DESCRIPTION HOURS AMOUNT

> TOTAL FOR SERVICES \$141,697.00

March 14, 2021

### EXHIBIT D

**Summary of Actual and Necessary Expenses** 

# SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE STATEMENT PERIOD

Expense Category	Total Expenses
Conference Call(s)	\$275.95
Electronic Research	\$469.06
TOTAL:	\$745.01

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### **EXHIBIT E**

**Expense Detail** 

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### OTTERBOURG P.C. 230 Park Avenue New York, NY 10169-0075

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DISBURSEMENTS FOR YOUR ACCOUNT		
Conference Call(s)		275.95
Electronic Research		469.06
	TOTAL DISBURSEMENTS	745.01